

# EXHIBIT L

Alpha Phi Alpha Fraternity, Inc. v. Raffensperger, Brad

Page 1

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF GEORGIA  
3 ATLANTA DIVISION  
4

5 CASE NUMBER: 1:21-CV-05337-SCJ  
6

7 ALPHA PHI ALPHA FRATERNITY INC., a nonprofit  
8 organization on behalf of members residing in  
9 Georgia; SIXTH DISTRICT OF THE AFRICAN  
10 METHODIST EPISCOPAL CHURCH, a Georgia  
11 Nonprofit organization; ERIC T. WOODS; KATIE  
12 BAILEY GLENN; PHIL BROWN; JANICE STEWART,  
13 PLAINTIFFS,  
14

15 V.  
16

17 BRAD RAFFENSPERGER, in his official capacity  
18 as Secretary of State of Georgia,  
19 DEFENDANT.  
20

21 DEPOSITION TESTIMONY OF:

22 Phil Brown

23 December 15, 2022

S T I P U L A T I O N S

IT IS STIPULATED AND AGREED by and between the parties through their respective counsel that the deposition of Phil Brown may be taken before Mallory B. Gray, CCR, RPR, a Court Reporter and Notary Public for the State at Large, via Zoom, on the 15th of December 2022, commencing at approximately 8:30 a.m.

IT IS FURTHER STIPULATED AND AGREED that the signature to and the reading of the deposition by the witness is not waived.

In accordance with Rule 5(d) of the Alabama Rules of Civil Procedure, as amended, effective May 15, 1998, I, Mallory B. Gray, am hereby delivering to Dan Weigel, the original transcript of the oral testimony taken the 15th of December 2022, along with the exhibit.

Please be advised that this is the same and not retained by the Court Reporter, nor filed with the Court.

Alpha Phi Alpha Fraternity, Inc. v. Raffensperger, Brad

Page 3

I N D E X

EXAMINATION BY:	PAGE NO.
Mr. Weigel	6
Mr. Garabadu	69
Mr. Weigel	71

E X H I B I T S

FOR THE DEFENDANT:	PAGE NO.
Exhibit 1 Notice of Deposition	11
Exhibit 2 Amended Complaint	47
(Exhibits not received at transcript production)	

1 A. I'm not sure.

2 Q. But you -- turning back, you -- to  
3 confirm, you do know that he ran as a  
4 candidate of the Republican Party?

5 A. Yes.

6 Q. So that even if your preferred  
7 candidate, Raphael Warnock, lost, Georgia  
8 still would've been represented by Herschel  
9 Walker in the United States Senate.

10 You understand that, correct?

11 A. Yes.

12 Q. Mr. Brown, do you believe that there  
13 are any needs of the minority community in  
14 Georgia that, in your opinion, differ from  
15 those of white residents?

16 A. Yes.

17 Q. And what are those?

18 A. There are many.

19 Q. Could you describe a few or maybe  
20 just the most important ones for me?

21 A. Well, for years, the black community  
22 has been overlooked when it comes to city,  
23 state, and county money. So there's a lot of